

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

In re SANDRIDGE ENERGY, INC.)	No. 5:12-cv-01341-G
SECURITIES LITIGATION)	
_____)	<u>CLASS ACTION</u>
)	
This Document Relates To:)	
)	
ALL ACTIONS.)	
_____)	

**DECLARATION OF EVAN J. KAUFMAN IN SUPPORT
OF PLAINTIFFS' OMNIBUS OPPOSITION TO
DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT**

I, Evan J. Kaufman, declare as follows:

1. I am a partner with the law firm of Robbins Geller Rudman & Dowd LLP, attorneys for Class Representatives Laborers Pension Trust Fund for Northern Nevada, Construction Laborers Pension Trust of Greater St. Louis, and Angelica Galkin (collectively, “Plaintiffs”) in this matter.

2. I respectfully submit this Declaration in support of Plaintiffs' Omnibus Opposition to Defendants' Motions for Summary Judgment.

3. Attached hereto are true and correct copies of the following exhibits:

Exhibit No.	Description
Deposition Transcripts	
1.	James Bennett Deposition Transcripts taken on February 13-14, 2019, Vols. I and II, Excerpted
2.	Steven D. Crane Deposition Transcript taken on May 16, 2019, Excerpted
3.	Lance Galvin 30(b)(6) Deposition Transcript taken on August 15, 2018, Excerpted

Exhibit No.	Description
4.	Matthew Grubb Deposition Transcript taken on March 21, 2019, Excerpted
5.	Steven Grenadier Deposition Transcript taken on June 19, 2019, Excerpted
6.	Craig Johnson Deposition Transcript taken on March 5, 2019, Excerpted
7.	Jeffrey Knupp Deposition Transcript taken on April 12, 2019, Excerpted
8.	David Lawler Deposition Transcripts taken on April 21-22, 2019, Vols. I and II, Excerpted
9.	David Miller Deposition Transcripts taken on December 12-13, 2018, Vols. I and II, Excerpted
10.	Maggie Silvertooth Deposition Transcript taken on December 20, 2018, Excerpted
11.	Paul Stark Deposition Transcript taken on January 18, 2019, Excerpted
12.	Bjorn I. Steinholt Deposition Transcript taken on June 12, 2019, Excerpted
13.	Robert W. Rasor Deposition Transcript taken on June 13, 2019, Excerpted
14.	Lindsey Walton Deposition Transcript taken on January 31, 2019, Excerpted
15.	Tom Ward Deposition Transcripts taken on March 28-29, 2019, Vols. I and II, Excerpted
16.	Kevin White Deposition Transcript taken on February 28, 2019, Excerpted
Deposition Exhibits	
17.	Steven Grenadier marked Deposition Vol. II Exhibits 2-6
18.	Matthew Grubb marked Deposition Exhibit 1
19.	Matthew Grubb marked Deposition Exhibit 12
20.	Matthew Grubb marked Deposition Exhibit 24, Excerpted
21.	Matthew Grubb marked Deposition Exhibit 28
22.	Craig Johnson marked Deposition Exhibit 36

Exhibit No.	Description
23.	Rodney Johnson marked Deposition Exhibit 2
24.	Rodney Johnson marked Deposition Exhibit 3
25.	Rodney Johnson marked Deposition Exhibit 4
26.	Rodney Johnson marked Deposition Exhibit 7
27.	Rodney Johnson marked Deposition Exhibit 38
28.	Rodney Johnson marked Deposition Exhibit 39
29.	Jeffrey Knupp marked Deposition Exhibit 1
30.	Jeffrey Knupp marked Deposition Exhibit 2
31.	Jeffrey Knupp marked Deposition Exhibit 5
32.	Jeffrey Knupp marked Deposition Exhibit 6
33.	David Lawler marked Deposition Exhibit 45
34.	David Lawler marked Deposition Exhibit 62
35.	David Lawler marked Deposition Exhibit 63
36.	David Lawler marked Deposition Exhibit 64
37.	David Lawler marked Deposition Exhibit 65
38.	David Lawler marked Deposition Exhibit 66
39.	David Lawler marked Deposition Exhibit 67
40.	David Lawler marked Deposition Exhibit 70
41.	David Miller marked Deposition Exhibit 13
42.	David Miller marked Deposition Exhibit 18

Exhibit No.	Description
43.	David Miller marked Deposition Exhibit 20
44.	David Miller marked Deposition Exhibit 22
45.	David Miller marked Deposition Exhibit 23
46.	David Miller marked Deposition Exhibit 37
47.	David Miller marked Deposition Exhibit 45
48.	Paul Stark marked Deposition Exhibit 1
49.	Paul Stark marked Deposition Exhibit 3
50.	Lindsey Walton marked Deposition Exhibit 8
51.	Lindsey Walton marked Deposition Exhibit 10
52.	Lindsey Walton marked Deposition Exhibit 11
53.	Lindsey Walton marked Deposition Exhibit 12
54.	Tom Ward marked Deposition Exhibit 4
55.	Tom Ward marked Deposition Exhibit 9
56.	Tom Ward marked Deposition Exhibit 10
57.	Tom Ward marked Deposition Exhibit 13
58.	Tom Ward marked Deposition Exhibit 14
59.	Tom Ward marked Deposition Exhibit 20
60.	Tom Ward marked Deposition Exhibit 21
61.	Tom Ward marked Deposition Exhibit 27
62.	Tom Ward marked Deposition Exhibit 28

Exhibit No.	Description
63.	Tom Ward marked Deposition Exhibit 34
64.	Tom Ward marked Deposition Exhibit 38
SEC Filings	
65.	SandRidge Energy, Inc. Form 10-K filed with the SEC for the fiscal year ended December 31, 2010 (with NSAI Reserve Report)
66.	SandRidge Energy, Inc. Form 10-K filed with the SEC for the fiscal year ended December 31, 2012, Excerpted
67.	SandRidge Energy, Inc. Form 8-K filed with the SEC, dated June 19, 2013
68.	SandRidge Mississippian Trust I Prospectus filed with the SEC, dated April 6, 2011, Excerpted, and SandRidge Trust II Prospectus filed with the SEC, dated April 18, 2012, Excerpted
Other	
69.	Expert Report of Steven D. Crane, Crane Energy LLC, Evaluation of SandRidge Mississippian Lime Expected Oil & Gas Recoveries dated March 1, 2019
70.	Expert Report of Bjorn I. Steinholt, CFA, dated March 1, 2019
71.	Rebuttal Expert Report of Bjorn I. Steinholt, CFA, dated April 29, 2019
72.	Expert Report of Steven Grenadier, Ph.D dated, April 4, 2019
73.	Expert Report of Robert W. Rasor, dated April 4, 2019
74.	J.P. Dick Declaration, dated March 27, 2019
75.	SD-SECURITIES-0000654, 2011 Investor/Analyst Meeting Presentation
76.	SD-SECURITIES-0001378, 2012 Investor/Analyst Meeting Presentation
77.	SD-SECURITIES-0005586, NSAI Estimates Report
78.	SD-SECURITIES-0075082, February 12, 2012 Conference Transcript
79.	SD-SECURITIES-0443266, July 10, 2012 Email and Agenda

Exhibit No.	Description
80.	SD-SECURITIES-0589939, June 12, 2012 Spreadsheet, Excerpted
81.	WCT_GLITZ_466009, Chart Mississippian Asset Sales
82.	RBC Capital Markets analyst report entitled “Looking More Focused,” dated November 8, 2012
83.	Stifel Nicolaus analyst report entitled “Reducing Target Price; 2013 Guidance Is Negative; Potential Permian Sale Is a Positive,” dated November 9, 2012
84.	Canaccord Genuity analyst report entitled “And we Thought Mississippian Was an Oil Play,” dated November 12, 2012
85.	UBS Global Oil and Gas Conference Transcript, dated May 24, 2011
86.	SandRidge Derivative Action, ECF No. 288-3, Contention Interrogatories
87.	Ward Letter to Shareholders, dated February 28, 2011
88.	Appendix A - Internal EUR Charts and Graphs Compared to Publicly Stated EURs
89.	Appendix B - Chart summarizing Crane’s findings
90.	Appendix C - Chart comparing Crane’s analysis with PES and TPH
91.	Appendix D – Pivot Table from Ward Exhibit 21
92.	Appendix E - Misstatement Chart
93.	Appendix F – Plaintiffs’ Response to Certain Portions of Defendants’ Appendixes

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this 24th day of July 2020.

/s/ Evan J. Kaufman

EVAN J. KAUFMAN

CERTIFICATE OF SERVICE

I, Evan J. Kaufman, certify that on July 24, 2020, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system for filing. Based on the records on file, the Clerk of the Court will transmit a Notice of Electronic Filing to the ECF registrants of record.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 24th day of July 2020, at Melville, New York.

/s/ Evan J. Kaufman

EVAN J. KAUFMAN